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: 021 202 8660 Email: nhiggitt@sahra.org.za CaseID: 19168

Date: Wednesday March 01, 2023 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

WKN-Windcurrent SA (Pty) Ltd. plans to develop, construct and operate a Wind Energy Facility (WEF) approximately 20km southeast of Loxton in the Northern Cape Province. The project site is situated in the Ubuntu Local Municipality (LM) which forms part of the Pixley ka Seme District Municipality (DM). The proposed Taaibos South Wind Energy Facility (WEF) will consist of up to 36 turbines, with a total facility output of up to 270MW. The WEF will also include a powerline and switching station in order to connect the WEF to the existing Eskom Substation (this will be applied for in a separate environmental application). The WEF will also include a Battery Energy Storage System (BESS), temporary and permanent laydown areas, an IPP Substation (SS), a Concrete Tower Manufacturing Facility (CTMF), access roads and a construction compound (CC) area. The construction footprint of the proposed WEF will be up to 139ha (inclusive of roads), rehabilitated to an operational footprint of up to 85ha (inclusive of roads).

CES Environmental and Social Advisory Services has been appointed by Taaibos South Wind Energy Facility RF (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Taaibos South Wind Energy Facility (WEF), near Loxton, Northern Cape Province.

A draft Scoping Report (DSR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of up to 36 turbines, permanent and temporary laydown areas adjacent to each turbine, foundations of each turbine, IPP Substation of up to 3 ha, collector substation, temporary laydown area, concrete tower manufacturing facility (CTMF) and construction compound (CC) up to 10 ha, battery energy storage system of up to 10 ha (in same area as temporary laydown, CTMF and CC), medium voltage cabling between turbines and switching stations to be laid underground where technically feasible, and internal access roads up to 36 km at up to 14 m wide.

It is noted that a field-based Heritage Impact Assessment (HIA) and field-based Palaeontological Impact



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Assessment (PIA) will be undertaken as part of the EIA phase of the EA application.

In an Interim Comment issued on the 18/08/2022, SAHRA noted the pending heritage assessments and requested that the comply with section 38(3) of the NHRA as required by section 38(8) of the NHRA. Since the issuing of the Interim Comment, an HIA and PIA have been submitted with the draft EIA (25/01/2023).

Almond, J. E. 2023. Palaeontological Heritage: Combined Desktop and Field-based Assessment. Victoria West Renewable Energy Cluster, Ubuntu Local Municipality (Pixley Ka Seme District Municipality), Northern Cape Province, RSA.

The proposed development area is underlain by the Abrahamskraal and Teekloof Formations. No identified palaeontological resources will be impacted by the proposed development. A total of 3 fossil sites were identified within the Taaibos South WEF development area. These include an isolated limb bone end fragment of large-bodied tetrapod (Site 464) and palaeosurface (Site 467 – 473) with tracks, grooves and invertebrate impressions of Grade IIIB heritage significance and burrows of Grade IIIC heritage significance. Sites 464 and 467-473 are located well outside the footprint and no impact is expected.

Recommendations provided in the report include the following:

- A specialist palaeontological heritage walk-down of the authorized project footprint is recommended in the Pre-Construction Phase;
- The ECO is to monitor substantial excavations (>1 m)
- A Chance Fossil Finds Procedure must be implemented during the construction phase.

Kruger, N. 2023. Heritage Impact Assessment Report for the Taaibos South Wind Energy Facility (WEF) Project, Pixley Ka Seme District Municipality, Northern Cape Province.

A total of 33 heritage resources were identified within the proposed development area. These include surface scatters of Middle Stone Age lithics of low medium heritage significance.

Recommendations provided in the report include the following:

• A suitably qualified archaeologist be appointed during the Construction Phase to monitor vegetation clearing and excavation activities for the possible occurrence of archaeological material remains and

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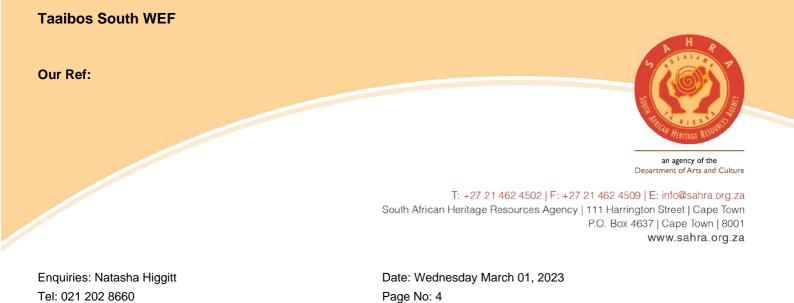
features in these areas (roads); and

• A Chance Finds Procedure is recommended to be implemented.

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 EIA and EMPr:

- 38(4)a The SAHRA has no objections to the proposed 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:
- A report detailing the results of the archaeological and palaeontological walkdown must be submitted to SAHRA prior to the construction phase;
- 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/ 021 202 8660) 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/Ngqabutho Madida 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 of the NHRA regarding offences;
- 38(4)e The following conditions apply with regards to the appointment of specialists:
- With reference to the mitigation work noted above, a qualified archaeologist must be appointed to undertake the work in terms of the permit applied for as noted above;
- 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 EIA and EMPr must be submitted to SAHRA for record purposes;



• The decision regarding the EA 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

CaseID: 19168

Email: nhiggitt@sahra.org.za

Natasha Higgitt Manager: Development Applications Unit South African Heritage Resources Agency

ADMIN:

Direct URL to case: https://sahris.sahra.org.za/node/602346 (DFFE, Ref: 14/12/16/3/3/2/2187)

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.