



an agency of the
Department of Arts and Culture

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South African Heritage Resources Agency | 111 Harrington Street | Cape Town
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CaseID: 19169

Date: Wednesday March 01, 2023
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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 30km southwest of Victoria West 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 Soutrivier North Wind Energy Facility (WEF) will consist of up to 31 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 122ha (inclusive of roads), rehabilitated to an operational footprint of up to 75ha (inclusive of roads).

CES Environmental and Social Advisory Services has been appointed by Soutrivier North Wind Energy Facility RF (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Soutrivier North 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 31 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 31 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 5 fossil sites were identified within the Soutrivier North WEF development area. These include postcranial bone fragments of a large tetrapod, burrows and tracks of Grade IIIB and IIIC heritage significance.

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 Soutrivier North Wind Energy Facility (WEF) Project, Pixley Ka Seme District Municipality, Northern Cape Province.

A total of 39 heritage resources were identified within the proposed development area. These include surface scatters of Middle Stone Age lithics of low medium heritage significance, and a corbel building with a rock shelter of medium heritage significance.

Recommendations provided in the report include the following:

- Site SRN28: It is recommended that a 100m no-go development buffer be demarcated with a fence or construction barricade during the Preconstruction Phase. Continuous site monitoring should be done in order to detect potential impact on the site at the earliest opportunity. Should impact on the site proof



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inevitable, a Phase 2 Assessment inclusive of site documentation, possible sampling and analysis must be conducted during the Preconstruction Phase. The necessary destruction permits from the relevant Heritage Resources Authorities should be obtained prior to site impact and destruction;

- 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 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;
 - Reports on the monitoring of sites SRN28 must be submitted to SAHRA every 6 months during 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 offence 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 offence 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

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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

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

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/602347>
(DFFE, Ref: 14/12/16/3/3/2/2190)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for

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- 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.