

Our Ref:



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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Enquiries: Natasha Higgitt
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CaseID: 20118

Date: Monday June 12, 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: Loxton Wind Facility 2 (Pty) Ltd

Nature of Activity: Loxton Wind Facility 2 (Pty) Ltd ('the Project Applicant') is proposing the construction and operation of the Loxton Wind Energy Facility 2. The facility is proposed for a potential generation capacity of up to 480 MW, and will comprise various buildings, access roads, a battery energy storage system (BESS), and a substation hub with associated electrical grid infrastructure such as but not limited to a 132kV / 400 kV overhead transmission powerline connecting the WEF to the national electrical grid network. **Development Location:** The proposed Loxton WEF 2 is located ~ 17 km north-east of the town of Loxton and fall within the Ubuntu Local Municipality and Pixley ka Seme District Municipality in the Northern Cape Province. **Application Process:** In terms of Chapter 5 of the National Environmental Management Act, 1998 (Act 107 of 1998 – NEMA), Environmental Impact Assessment (EIA) Regulations, 2014 (as amended), the Project Applicant appointed Arcus Consultancy Services South Africa (Pty) Ltd (Arcus), to act as the project manager and to undertake the Scoping and Environmental Impact Assessment (S&EIA) process as the independent environmental impact assessment practitioner (EAP).

Arcus Consulting Services South Africa (Pty) Ltd has been appointed by Loxton Wind Facility 2 (Pty) Ltd to undertake an Environmental Authorisation Application for the proposed Loxton Wind Energy Facility 2, 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 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed activities will include the construction of up to 63 wind turbines with a maximum hub height of 200 m and a rotor diameter with up to 200 m, transformers at the base of each turbine, concrete turbine foundations, permanent crane hardstand at each turbine, temporary blade hardstand at each turbine, temporary laydown areas, battery energy storage system (BESS), cabling between turbines (underground where practical), two on-site substations, access roads (up to 100 km), two temporary site camps and concrete batching plants, two operation and maintenance buildings within an application area of 110 ha.

Natura Viva CC and ASHA Consulting (Pty) Ltd were appointed to provide heritage specialist input as part of the EA process as per section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act,



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Act 25 of 1999 (NHRA).

Almond, J. E. 2022. Palaeontological Heritage: combined desktop and field-based Compliance Statement. Proposed Loxton WEF Cluster, Ubuntu Local Municipality and the Pixley Ka Seme District Municipality in the Northern Cape Province.

*Only the results pertaining to Loxton WEF 2 will be discussed below.

The proposed development footprint is underlain by the Beaufort Group (specifically the Abrahamskraal Formation) and Karoo Dolerite, with Late Caenozoic superficial deposits. According to the report, a handful of fossils sites were recorded in the WEF Cluster, however, no details were provided on the identified fossils sites. It is noted that the palaeosensitivity of the development footprint is low and the impact of local palaeontological heritage is anticipated to be low. A Chance Fossil Finds Procedure is recommended to be implemented.

Orton, J. 2022. Heritage Impact Assessment: Proposed Loxton Wind Energy Facility 2, Carnarvon and Victoria West Magisterial Districts, Northern Cape

A total of 23 heritage resources were identified within the proposed Loxton WEF 2 development application area. These include surface scatters of Stone Age lithics and a dam wall of low heritage significance, scatters of historical artefacts, stone-walled structures, and cairns of very low heritage significance, stone walled structures of medium significance, a burial ground consisting of 5 graves, the Aarfontein farmstead, the Yzerverkpoort farmstead and corbelled houses of high heritage significance.

Recommendations provided in the report include the following:

- The road design must take account of the sensitive areas;
- Existing roads should be reused where possible;
- Where existing roads pass through sensitive areas this is preferred over making new roads but the alignments should ensure the integrity of any specific resources in those sensitive areas;
- If all other factors are equal and there are more turbines positions than required, then preference should be given to dropping numbers 101, 100 and/or 99 in that order due to their proximity to the R63 and their potential to be seen as outliers;
- No stones may be removed from any archaeological sites;



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- A pre-construction survey of all parts of the layout that have not yet been surveyed must be undertaken; and
- If any archaeological material or human burials are uncovered during the course of development then work in the immediate area should be halted. The find would need to be reported to the heritage authorities and may require inspection by an archaeologist. Such heritage is the property of the state and may require excavation and curation in an approved institution.

In an Interim Comment issued on the 20/01/2023, SAHRA requested that the PIA be revised to include the results of the field survey. The PIA must provide separate sections for each development under application i.e. clear discussions on each WEF application. The HIA must be revised to include maps with the relevant site numbers at each point provided in relation to the location of development components i.e. turbines, BESS, roads, laydown areas etc. The map of the track logs in the HIA must be revised to show all project components such as the BESS, roads, substations laydown areas etc.

Since the issuing of the Interim Comment, the draft EIA and appendices, with a revised HIA and PIA.

Almond, J. E. 2023. Palaeontological Heritage: combined desktop and field-based Compliance Statement. Proposed Loxton Wind Energy Facility 2, Ubuntu Local Municipality (Pixley Ka Seme District Municipality) in the Northern Cape Province.

A total of four fossil sites were identified within the proposed development area. These include bone breccia blocks, possible rhizoliths or fossilized burrows, sandstone bedding plane showing poorly preserved, small scale trace fossils of burrowing invertebrates of Grade IIIC heritage significance with two sites of Grade IIIB heritage significance. No mitigation measures are recommended for these sites.

Orton, J. 2023. Heritage Impact Assessment: Proposed Loxton Wind Energy Facility 2, Carnarvon and Victoria West Magisterial Districts, Northern Cape

A total of 32 heritage resources were identified within the proposed development footprint. These include sites as previously described in the HIA summary above, as well as a rock shelter with stone walling and scattered artefacts, stone kraals of low heritage significance, farm shed and storeroom, and a stone kraal of medium heritage significance, and a farmstead of high heritage significance.

Recommendations provided in the report include the following:

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- Existing roads should be reused where possible and if any surfacing is required then high contrast materials should be avoided;
- Where existing roads pass through sensitive areas this is preferred over making new roads, but the alignments should ensure the integrity of any specific resources in those sensitive areas. In this regard, No-go signage will need to be put in place and the sites monitored at waypoints 008, 011, 1281, 1229, 1230;
- The archaeological site at waypoint 1238 will need to be avoided through micrositing the access road or else excavated, sampled and recorded as necessary prior to construction. If it is avoided, then No-Go signage must be installed and the site monitored;
- No stones or other materials may be removed from any historical sites;
- Make use of an early warning system that can switch on navigation lights only when they are needed (if such a system is available and approved at the time of construction);
- A pre-construction survey of all parts of the layout that have not yet been surveyed must be undertaken, including the locations of all ancillary infrastructure; and
- A Chance Finds Procedure is recommended to be implemented.

Final Comment

The following comments are made as a requirement in terms of 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 EMP:

- 38(4)a – The SAHRA Development Applications Unit (DAU) 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 no-go buffer of 5 m must be maintained around site 1238;
 - A report detailing the results of the pre-construction survey must be submitted to SAHRA for review and comment prior to the construction phase. No construction may occur without comments from SAHRA in this regard;
- 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 DAU (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

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and item 5 of the Schedule;

- 38(4)c(ii) – If unmarked human burials are uncovered, the SAHRA DAU (Natasha Higgitt 021 202 8660) 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(1) of the NHRA regarding offences;
- 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 EIA must be submitted to the SAHRIS application for record purposes;
 - The decision regarding the EA application must be submitted to the SAHRIS application for record purposes.

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:

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Direct URL to case: <https://sahris.sahra.org.za/node/609024>
(DEA, Ref: 14/12/16/3/3/2/2237)

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.