

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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CaseID: 20118

Date: Friday January 20, 2023
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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: 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.

Interim Comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit requests 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.

Further comments will be issued upon receipt of the above revised reports and draft EIA inclusive of appendices.

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
Heritage Officer
South African Heritage Resources Agency

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Phillip Hine
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South African Heritage Resources Agency

ADMIN:
Direct URL to case: <https://sahris.sahra.org.za/node/609024>
(DEA, Ref: TBC)