

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](mailto: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](http://www.sahra.org.za)

Enquiries: Natasha Higgitt  
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Email: [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)  
CaseID: 20902

Date: Tuesday May 30, 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: Soyuz 6 (Pty) Ltd

**The applicant Soyuz 6 (Pty) Ltd is proposing the development of a commercial Wind Energy Facility (WEF) and associated infrastructure on a site located approximately 53 km South East of Britstown within the Ubuntu Local Municipality and the Pixley ka Seme District Municipality in the Northern Cape Province.**

CES Environmental and Social Advisory Services has been appointed by Soyuz 6 (Pty) Ltd to conduct an Environmental Authorisation (EA) Application for the proposed Soyuz 6 Wind Energy Facility (WEF), near Britstown, Northern Cape Province (DFFE Ref: 14/12/16/3/3/2/2210).

A draft Environmental Impact Assessment Report has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. It must be noted that the Scoping Phase documents were uploaded to a separate SAHRIS application (Case ID 19664

<https://sahris.sahra.org.za/cases/soyuz-6-wind-energy-facility-ubuntu-municipality-northern-cape-province>).

SAHRA issued an Interim Comment on the case on the 21/10/2022.

The proposed development will include the construction of up to 75 turbines, a transfer at the base of each turbine, concrete turbine foundations, hardstand, laydown area at each turbine, temporary concrete batch plants at the construction camp and laydown areas, Battery Energy Storage System (BESS), internal overhead powerline between substations, temporary construction areas at each overhead tower position, permanent service roads, cabling between turbines and substation along roads and be buried where possible, six permanent met masts, three substations, operation and maintenance facilities, laydown areas at each substation, three temporary construction camps, access roads including stormwater infrastructure within an application area of 150 ha.

Banzai Environmental (Pty) Ltd and Mr. Nelius Kruger was appointed to provide heritage specialist input into the EA process as required by section 24(4)b(iii) of NEMA and section 38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).



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*Butler, E. 2023. Palaeontological Heritage Impact Assessment report for Soyuz 6 Wind Energy Facility, Northern Cape*

The proposed development area is underlain by Late Caenozoic alluvium, Jurassic Karoo Dolerite, the Middle Permian Abrahamskraal formation. A total of two palaeontological sites were identified within the proposed development area. These include one fragmented vertebrate long bone and a fragmented plant fossil.

Recommendations provided in the report include the following:

- The ECO for this project must be informed that the Abrahamskraal Formation, Adelaide Subgroup, Beaufort Group, Karoo Supergroup) has a Very High Palaeontological Sensitivity;
- A Chance Find Protocol is recommended to be implemented;
- These recommendations should be incorporated into the Environmental Management Plan for the Soyuz 6 WEF.

*Kruger, N. 2023. Heritage Impact Assessment Report for the Soyuz 6 Wind Energy Facility Project, Pixley Ka Seme District Municipality, Northern Cape Province*

A total of 39 heritage resources were identified within the proposed development area. These include 38 Stone Age lithics of low-medium heritage significance and one Middle Stone Age site (S6WEF13) of medium heritage significance.

The proposed WEF will be visible from the R398 and will pose a high visual impact on the landscape. The landscape is characterized by rural Karoo farmlands, grass plains and low mountain vegetation, and various layers of heritage from the pre-colonial period to the more recent that has modified the landscape through various developments.

Recommendations provided in the report include the following:

- It is primarily recommended that a 50m no-go development buffer be implemented and that project infrastructure be redesigned to avoid encroachment on the site (S6WEF13) or the no-go buffer. Should this measure not be feasible, further Phase 2 specialist assessment of the site (documentation, surface scatter collection, specialist stone tool analysis, permitting) will be required for the site during the Preconstruction Phase. General site monitoring during all Phases of the development will be required

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should the site be conserved in order to avoid the damage or destruction of previously undetected heritage remains.

- It is recommended that final site walkovers be conducted of potential heritage sensitive zones in areas where turbine positions and access road alignments have been changed significantly prior to construction. In addition, site walkovers of potential heritage sensitive zones in the proposed 132kV OHL line alignments, laydown areas, construction camps and BESS areas will be required prior to construction;
- The term “Living Heritage” can broadly refer to a place of cultural heritage and sacred nature; with cultural attributions that are not generally physically manifested. Ritual and symbolic spaces and practices, and the material residues thereof convey an intangible cultural significance beyond the physical site or artefact, where the meaning of the ritual area speaks directly of a sense of place and lived experience. Such sites might occur on the project area or its surroundings and due cognisance should be taken of these sites of “Living Heritage” in the cultural landscape. In addition, it is possible that groups, farmers and locals living in the area have occupied the region for many generations and have expressed long-term cultural associations with the region. Therefore, it is important to ascertain from these respondents whether there are any further undetected sites of cultural significance in the area to which they relate and / or attach cultural meaning;
- Various mitigation measures regarding visual impacts are provided in section 10.2 of the HIA;
- A Chance Finds Procedure is recommended to be implemented.

In an Interim Comment, SAHRA requested that the PIA be revised to include a statement of the significance of the identified fossils and provide an indication of the distance between the identified fossils in relation to the proposed development. Since the issuing of the Interim Comment, a revised PIA and the Final EIR have been submitted (29/05/2023).

The updated PIA has stated that the identified fossils are of low heritage significance. All fossils are located over 50 m from any development activity.

## 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;

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- 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:
- Walkdown reports from the archaeologist must be submitted to SAHRA prior to construction for comment. No construction may occur without SAHRA comments in this regard;
- SAHRA reserves the right to impose additional conditions on the development based on the results of the walkdown. SAHRA reserves the right to object to the development based on the result of the walkdown;
- 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 (Natasha Higgitt 021 202 8660/ [nhiggitt@sahra.org.za](mailto:nhiggitt@sahra.org.za)) 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

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

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## ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/615231>  
(DFFE, Ref: 14/12/16/3/3/2/2210)

## 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.