

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: 16672

Date: Friday July 23, 2021

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Interim Comment

In terms of Section 38(3) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Terramanzi Group (Pty) Ltd

Private Bag x26
Tokai
7966

This application is for the proposed amendment to the existing Noblesfontein WEF located on the Northern Cape side of the boundary with the Northern and Western Cape. The DFFE has advised that a Basic Assessment process must be followed for this proposed amendment. The Noblesfontein WEF is located in the Northern and Western Cape provinces of South Africa within the Ubuntu and Beaufort West local municipalities, approximately 25km from Victoria West, 25km South of Hutchinson and 7.5 km North of Three Sisters. However, the proposed amendments are located only within the Northern Cape. The wind energy facility is on the Noblesfontein farm, which consists of 11 000 hectares of Karoo veld. The Noblesfontein WEF is approved for 44 turbines (DEFF 12/12/20/1993/1) and currently only has 41 installed with an output of 2MW per turbine. The Client wishes to construct two more turbines with a technical specification upgrade of between 4MW and 5.6MW. These 2 turbines will be a larger version of the currently installed turbines and hence the requirement for a Basic Assessment Process. The location of these 2 additional turbines will form part of the authorized and approved Noblesfontein WEF Project footprint. This desktop assessment is intended to identify opportunities and heritage constraints within the broader development area to inform the proposed layout. Detailed WTG dimensions for the 10MW facilities: Upgrading 2 WTGs from 3MW specifications (with a total output of 6MW) to 2 WTGs of between 4MW and 5.6MW specifications (with a total output up to 10MW) Each turbine will be a steel tower with a maximum height of up to 137.5m and will include a nacelle (gear box) with three rotor blades Each rotor blade will have a maximum length of up to 82m in length with a total rotor diameter of up to 165m The total swept rotor area is a maximum of 21382.5m² The total turbine height will be a maximum of up to 220m Maximum sound output will be up to 104.9dB

Terrmanzi Group (Pty) Ltd has been appointed by Sarge Development (Pty) Ltd (previously known as CORIA (PKF) Investments 28 (Pty) Ltd) to conduct an Environmental Authorisation (EA) Amendment Application for upgrades to the authorised Noblesfontein Wind Energy Facility (WEF), Ubuntu Municipality, Northern Cape Province (DFFE Ref: 2021-04-0020).



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A draft Basic Assessment Report (dBAR) has been submitted in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA EIA Regulations. The proposed amendments is for technical specification upgrades and additional infrastructure which includes, 132kV overhead power line (OHPL) of up to 500 m, an additional substation to service the turbines, service road and laydown area for two turbines, upgrading of authorised two wind turbines, and increasing the maximum height of the two wind turbines, and increasing the maximum wind turbine blades.

SAHRIS Case ID 2005 has reference to this case (<https://sahris.sahra.org.za/cases/karoo-renewable-wind-energy-facility-n...>). In an Interim Comment issued on the 04/06/2013, SAHRA's APM Unit Acknowledged receipt of EA documents and HIA reports and recommendations contained there in. SAHRA requested that outstanding information such as a palaeontological assessment be submitted. The request of which was not heeded by the developer. In a Letter Issued on 05/05/2015 SAHRA's APM Unit made a follow up on the Interim Comment and request that outstanding studies be submitted should the project be continuing.

It should be noted that the above were not submitted to the SAHRIS case application regardless of the following up from SAHRA. As a result, SAHRA was not provided with the opportunity to give a Final Comment on the project prior to the approval of the EA for inclusion of heritage comments in the EA and/or EMPr. It is should also be noted that the project has since been granted EA, hence the application for Amendment.

CTS Heritage was appointed to provide heritage specialist input as part of the EA Amendment process as required by section 24(4)b(iii) of NEMA, and in terms of section 38(3) of the National Heritage Resources Act, Act 25 of 1999 (NHRA) as required by section 38(8) of the NHRA.

Levin, J. March 2021. Proposed Amendment to the Existing Wind Energy Facility, Noblesfontein in the Northern Cape.

The Specialist undertook a Heritage Scoping Assessment and/or Heritage Screener of the proposed area of development and thoroughly appraised previous Heritage Impact Assessment Studies in the large project area as well as those that relate specifically to the project area. In the final assessment, the specialist states that "It is possible that the proposed development of two turbines and associated access roads, and OHL will negatively impact significant archaeological heritage, and as such it is recommended that the area proposed for development as part of the amendment application is assessed for significant archaeological heritage such as rock art and rock engravings associated with dolerite outcrops prior to construction activities. It is further



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recommended that a Palaeontological Chance Find Procedure be implemented during construction.

The specialist also supports recommendations made by Roussow (2011) with regards to palaeontological resources, which states that a field assessment of the potential impact of the proposed development activities on palaeontological resources must be undertaken.

It should be noted that the above were not submitted to the SAHRIS case application regardless of the following up from SAHRA. As a result, SAHRA was not provided with the opportunity to give a Final Comment on the project prior to the approval of the EA for inclusion of heritage comments in the EA and/or EMP. It should also be noted that the project has since been granted EA, hence the application for Amendment.

Rososouw, L. March 2011. Palaeontological Desktop Assessment of a Commercial Renewable Wind Energy Facility Site Located Approximately 34 km south of Victoria West in the Western Cape Province Western Cape Province.

The desktop study indicated that parts of the proposed development are likely to impact on fossil-bearing bedrock. It is anticipated that future developments that call for localized trench or pit excavations, exposing fresh bedrock and old superficial deposits in the area, will require a phase 1 Palaeontological Impact Assessment. The report Also stated that effective mitigation of palaeontological heritage for this project would only be feasible once the positions of individual structures and access roads have been finalized. The report went further to highlight that pre-excavation surveys of selected sites and access roads would be necessary where the development will take place directly on potential fossil-bearing strata. These activities may involve:

- any fossiliferous exposures already existing within the broader footprint of the proposed development,
- fresh cuttings along new access roads,
- substantial bedrock excavations such as burrow pits,
- as well as foundation excavations for the wind turbines, photovoltaic panels, and other structures.

It should be noted that the above recommendations contained in the Desktop PIA were not adhered to and a fielded-based PIA was not submitted to the SAHRIS case application regardless of the follow up from SAHRA. As a result, SAHRA was not provided with the opportunity to give a Final Comment on the project prior to the approval of the EA for inclusion of heritage comments in the EA and/or EMP. It should also be noted that the

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project has since been granted EA, hence the application for Amendment.

Interim Comment

The SAHRA APM Unit acknowledges receipt of the dBAR and HIA Screener, the outcomes and recommendations provided therein. SAHRA's APM request has noted the potential impact of project activities on palaeontological resources as articulated by Rossouw (2011) and supported in the submitted Heritage Screen and request that the following is undertaken in terms of section 38(3) of the National Heritage Resources Act (25 of 1999) as part of the EA Amendment application.

Given the recommendations of a desktop assessment of the potential impact of the project on palaeontological resources, SAHRA request that a field-based PIA be submitted by a qualified palaeontologist in support of the Amendment application. The report must comply with section 38(3) of the NHRA and the SAHRA 2006 Minimum Standards: Archaeological and Palaeontological Component of Impact Assessments, and the 2012 Minimum Standards: Palaeontological Component of Heritage Impact Assessments. The Minimum Standards provides allowance for a Letter of Recommendation for Exemption that can be submitted by a qualified palaeontologist should they deem it appropriate.

Further comments will be issued upon receipt of the above. The applicant is advised to extend the EA process in terms of section 19(1)b of the NEMA EIA regulations to comply with this comment.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

Elijah Dumisani Katsetse
Heritage Officer
South African Heritage Resources Agency

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Phillip Hine

Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/576392>