

Date: 5 May 2022

Ms A Strong
WSP in Africa
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Dear Ms Strong

ESIZAYO WIND ENERGY FACILITY EA AMENDMENT: SPECIALIST IMPACT STATEMENT

The Esizayo Wind Energy Facility (WEF) was given environmental authorization (EA) by the then Department of Environmental Affairs (DEA), the Competent Authority, on 14 July 2017.

The Esizayo WEF is currently authorised for up to 56 wind turbine generators (WTG) with a generating capacity of up to 6 MW each and a hub height of up to 120 m and rotor diameter of up to 150 m. As part of the EMPr amendment completed in early 2022, BioTherm Energy (Pty) Ltd (BTE) reduced the number of turbines to 32.

BTE now wish to undertake a Part 2 Amendment of the existing EA to amend the hub height and rotor diameter to 150m and 200m respectively and increase the WTG generating capacity to a maximum of 10 MW. The larger WTGs mean an increase in the turbine base size, but this will be small. The rest of the WEF layout and specifications remain the same.

The proposed EA amendment requires specialist input, in the form of an impact statement or report, into the amendment application.

Please note that this specialist impact statement is confined to addressing the potential impacts of the proposed EA amendment on archaeological resources, the historical built environment and graves and burials. Separate palaeontological and visual impact statements will be provided by the respective specialists.

The heritage impact assessment (HIA) produced by ACO Associates in January 2017 (Webley & Halkett 2017) as part of the Environmental Impact Assessment (EIA) process considered the potential impacts of the proposed WEF on all classes of heritage resources (i.e. palaeontological, pre-colonial and historical archaeological, graves and cemeteries and visual).

As part of the 2022 EMPr amendment process, ACO Associates produced an EMPr update report (Gribble 2022) which compared the results of all the archaeological fieldwork carried out for the WEF with the amended, final project layout to:

- confirm that the new layout took previously identified and new heritage sensitivities into account;
- identify any heritage resources which may be impacted by the new layout during the construction, operation and decommissioning phases of the project;
- identify any project elements that need to be moved to avoid heritage resources; and
- update, as necessary, the previous assessment of impacts and mitigation proposed for the WEF with text to be included in the EMPr.

The heritage resources (excluding palaeontology) identified in the HIA and EMPr Update Reports, can be summarised as follows:

- Some very limited evidence for Early or Middle Stone Age (ESA and MSA) material;
- A few large scatters of Later Stone Age (LSA) stone artefacts of medium significance;
- At least two rock art sites, the one with indistinct human figures and the other with faded finger daubs. Two of the LSA stone scatters referred to above were found on talus slopes below the rock art sites. The rock art sites are of high significance;
- A few “pastoralist settlements” containing LSA artefacts, ceramics and grindstones along dry river beds in the bottom of valleys of medium significance;
- A historical cemetery next to the entrance to the farm Aanstoot that contains the graves of several families associated with the farm Nuwerus on the opposite side of the R345. There are also a number of other rock cairns/potential graves within the study area. These are of high significance;
- A spread of early 20th century historical material in association with stone enclosures (fortifications) on the lower slopes of two koppies on the farm Aanstoot which may represent the debris from the South African War;
- Numerous roughly-packed, circular enclosures of dry stone walling, which may represent both pre-colonial and colonial era stone kraals. These are distributed along the lower slopes of small koppies, and close to streams or fountains across the study area and are of low to medium significance.

The 2021 EMPr walkdown survey added only a handful of sites to those previously identified. With the exception of a line of stone markers along the Aurora / Aanstoot property boundary (which may be affected by the proposed new overhead powerline to the Komsberg substation that is subject to separate Basic Assessment), however, none of the new heritage resources identified were considered conservation-worthy.

Heritage Specialist Impact Statement:

The surveys conducted for both the HIA and the EMPr update identified no heritage resources on the high-lying ridges which will accommodate the WTGs. Both assessments found that potential impacts arising from the Esizayo WEF would, instead, be more likely to result from the construction of access roads, powerlines and ancillary infrastructure such as the substation.

The current Part 2 EA amendment application is premised on increasing WTG hub height from 120 m to 150 m and rotor blade diameter from 150 m to 200 m, with a resultant increase in generating output. Otherwise, 32 WTG layout and other specifications of the authorized Esizayo WEF assessed in the EMPr update remain the same, except for a small increase in the base size of each turbine.

It is our reasoned opinion that the current amendment being proposed to the Esizayo WEF will occasion no changes to the identified project impacts on heritage resources and provided the mitigation measures recommended in the EMPr Update Report (Gribble 2022) are implemented, the overall impact of the construction of the WEF is tolerable and generally of low significance. From a heritage perspective, therefore, the proposed amendments are considered acceptable.

Yours sincerely



John Gribble
Senior Archaeologist and Heritage Consultant

References:

Gribble, J. 2022. *Amendment of the Environmental Management Programme and Final Layout for the Esizayo Wind Energy Facility: Heritage Update Report*. Unpublished report for WSP Group Africa (Pty) Ltd. ACO Associates. Cape Town.

Webley, L. & Halkett, D. 2017. *Heritage Impact Assessment: Proposed Construction of the Esizayo Wind Energy Facility Near Laingsburg in the Western Cape Province*. Unpublished report for WSP/Parsons Brinckerhoff. ACO Associates. Cape Town.