

Humansrus Solar 3 (Pty) Ltd
Registration Number: 2015/257032/07

Environmental Authorisation Number: 14/12/16/3/3/2/888

16 October 2020

Dear Sir

AMENDMENTS TO THE HUMANSRUS SOLAR 3 PV FACILITY

The client has proposed an amendment to the Humansrus Solar 3 PV Facility on the farm Humansrus 147, Pixley Ka Seme District Municipality, Prieska, Northern Cape.

The Environmental Authorisation (EA) from the Department of Environmental Affairs is dated 29 May 2017. Subsequently, Part 1 amendments have been authorised to extend the validity period of the EA and increase the generation capacity. A copy of the EA and the amendment have been provided.

The EA notes under Specific Condition 39: "If any heritage resources of archaeological or palaeontological significance are discovered during construction activities, construction must cease and a Phase 2 rescue operation must be undertaken by a qualified specialist. The findings must be submitted to SAHRA and should they have implications to the layout or mitigation measures, these must be submitted to this Department with SAHRA's recommendations for review and consideration".

I have assessed the proposed amendment with respect to the results obtained during the archaeological survey of 23 October 2014. An updated Archaeological Impact Assessment (part of an amended HIA) was submitted to SAHRA in June 2016, but this did not involve any further fieldwork and no additional archaeological/heritage sites were identified.

1. PROPOSED AMENDMENTS

The amendment involves the following:

- The construction of a 500 MWh Battery Energy Storage System (BESS), with covering an area of up to 2 hectare, adjacent to the on-site substation within the approved project footprint (Figure 1). The batteries will require a solid foundation/plinths which means that the ground surface will be levelled.

2. WILL THE AMENDMENTS RESULT IN CHANGES TO THE NATURE OR SIGNIFICANCE OF THE HERITAGE IMPACTS?

The revised 2016 layout avoided impacts to significant heritage sites (including archaeological sites) as described in the integrated HIA submitted by Perception Planning in April 2016. The archaeological survey identified "a diffuse spread of ESA and MSA stone artefacts across the study area for Humansrus 3". No new impacts to heritage are anticipated with the proposed 2020 amendments (Figure 2).

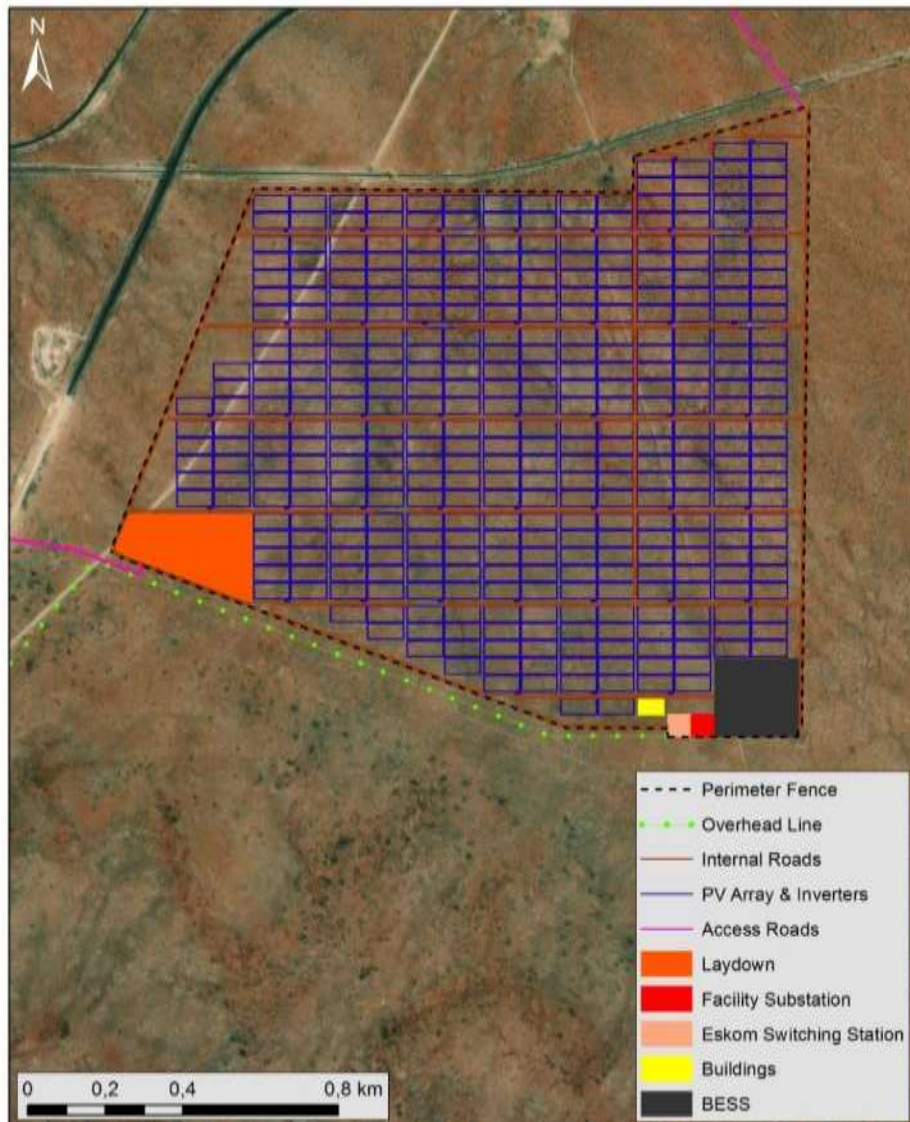


Figure 1: Position of the proposed BESS in grey, in the lower south-west corner near the substation.



Figure 2: Location of BESS with respect the survey paths and recorded sites (Google Earth 2014).

3. WILL THE AMENDMENTS RESULT IN ANY ADDITIONAL IMPACTS NOT PREVIOUSLY ASSESSED IN THE STUDY?

The tracks and archaeological sites recorded during the October 2014 archaeological survey are shown in Figure 2.

No additional impact is anticipated with the proposed amendment.


4. WHETHER THE AMENDMENTS WILL REQUIRE ANY ADDITIONAL MANAGEMENT OUTCOMES OR MITIGATION MEASURES?

The only mitigation measures in the HIA report, submitted to South African Heritage Resources Agency in June 2016, are those which have been incorporated into the Specific Conditions of the EA. No new mitigation measures will be required.

5. MOTIVATION: NO FURTHER STUDIES ARE REQUIRED

I, Lita Webley, have reviewed the proposed amendment to the environmental authorisation. My impact ratings for the proposed development have not been changed with the proposed amendments.

Yours Sincerely



Dr Lita Webley

DECLARATION OF INDEPENDENCE

I, Lita Webley, declare that –

- I act as the independent specialist in this application;
- I will perform the work relating to the application in an objective manner, even if this results in views and findings that are not favourable to the applicant;
- I declare that there are no circumstances that may compromise my objectivity in performing such work;
- I have expertise in conducting the specialist report relevant to this application, including knowledge of the Act, regulations and any guidelines that have relevance to the proposed activity;
- I will comply with the Act, regulations and all other applicable legislation;
- I have no, and will not engage in, conflicting interests in undertaking of the activity;
- I undertake to disclose to the applicant and the competent authority all material information in my possession that reasonably has or may have potential of influencing – any decision to be taken with respect to the application by the competent authority; and – the objectivity of any report, plan or document to be prepared by myself for submission to the competent authority;
- All the particulars furnished by me in this form are true and correct; and
- I realise that a false declaration is an offense in terms of regulation 71 and is punishable in terms of section 24F of the Act.

Signature of specialist



Specialist carrying out the application

Dr Lita Webley