

SiVEST

4 Pencarrow Crescent, La Lucia Ridge Office Estate,
Umhlanga Rocks. 4320
PO Box 1899, Umhlanga Rocks. 4320
KwaZulu-Natal. South Africa



South African Heritage Resource Agency
111 Harrington Street
Cape Town
PO Box 4637
8001

Division: Environmental Consulting
Your Reference: 16540
Our Reference: 16499 Platsjambok West
Date: 11 June 2021

ATTENTION: NATASHA HIGGIT

Dear Natasha

CORRESPONDENCE AND FINAL COMMENT FROM SAHRA FOR THE BATTERY ENERGY STORAGE SYSTEM (BESS) FOR PLATSJAMBOK WEST SOLAR PV FACILITY

The above mentioned project refers.

While SiVEST notified SAHRA of the availability of the Platsjambok BESS Draft BA Report for comment, the report was not uploaded onto the SAHRA website and therefore SAHRA was not provided the opportunity to provide comment. This was brought to SiVEST's attention and the reports were uploaded on 20th and 27th of May respectively for SAHRA to review and comment.

SAHRA provided comment on the 9th of June 2021 and requested that the following be undertaken:

- A report detailing the results of the recommended archaeological walk-down be submitted to SAHRA for review and comment;
- A Heritage Management Plan (HMP) must be developed to ensure the long-term management of in situ heritage resources, including monitoring during construction of the in situ heritage resources.

SAHRA further requested that that an undertaking to amend the Environmental Authorisation (EA) or update the Environmental Management Plan (EMPr) to include the above conditions be submitted to them before close of business on Friday 11th June 2021. Should the applicant fail to do so, SAHRA stated that they will exercise the right to appeal the granting of the EA for the project.

SiVEST conducted an in-depth review of the EMPr and identified that SAHRAs requirements were already detailed in the EMPr that was submitted for review and comment as part of the Environmental Impact Assessment process. The conditions required by SAHRA are included in the EMPr as follows:

SiVEST SA (Pty) Ltd | Registration No. 2000/006717/07 t/a SiVEST

Part of the SiVEST Group | www.sivest.com

South Africa

Durban +27 31 581 1500
East London +27 43 721 2819
Johannesburg +27 11 798 0600
Pietermaritzburg +27 33 347 1600
Pretoria +27 11 798 0600
Richards Bay +27 35 789 2066
info@sivest.co.za

Mauritius

SiVEST Mauritius
Curepipe +230 670 4454
Daniel Wong Chung Co. Ltd
Curepipe +230 674 5727
www.dwcsivest.com

United Kingdom

MBM Consulting
London, England +44 20203 817 7691
Tunbridge Wells, England +44 1892 557 290
www.mbmconsult.com



SAHRA Requirement	Approved EMPr statement confirming SAHRA requirements
<p>A report detailing the results of the recommended archaeological walk-down be submitted to SAHRA for review and comment</p>	<p><u>Page 113</u> states that the Heritage Plan will be “updated by a heritage specialist once the detailed design stages of the proposed development are complete and the walk-through study has been undertaken”. This plan is required to be submitted to SAHRA for comment.</p> <p><u>Page 114:</u> If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find:</p> <p>The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA). (Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.</p>
<p>A Heritage Management Plan (HMP) must be developed to ensure the long-term management of in situ heritage resources, including monitoring during construction of the in situ heritage resources.</p>	<p><u>Page 87</u> includes “A management plan for the heritage resources needs then to be compiled and approved for implementation during construction and operations”.</p>

SiVEST has discussed the above conditions with SAHRA who have confirmed that they are satisfied that their concerns have been addressed and no appeal procedures will be followed.

The detailed correspondence between SAHRA and SiVEST discussing the information above is included as **Appendix A**.

Yours sincerely



Michelle Guy
Environmental Scientist
SiVEST



Appendix A

Michelle Guy

From: Michelle Guy
Sent: Friday, 11 June 2021 09:26
To: Natasha Higgitt
Cc: Michelle Nevette; Phillip Hine
Subject: RE: 16499: BESS BAs SAHRA Comment

Hi Natasha

I will upload the letter as well as the final EMPr.

Thanks.

Kind regards,

Michelle Guy (*Pr.Sci.Nat*)
Environmental Scientist
SiVEST Environmental Division

D +31 581 1579 | **T** +27 31 581 1500 | **E** michelleg@sivest.co.za | www.sivest.com



Engineering Consulting | Project Management | Environmental Consulting | Town & Regional Planning | Management Systems Consulting

LEVEL 2 BBBEE CONTRIBUTOR IN SOUTH AFRICA

South Africa Durban | East London | Johannesburg | Pietermaritzburg | Pretoria | Richards Bay www.sivest.co.za
Mauritius Daniel Wong Chung Co. Ltd / SiVEST Mauritius: Curepipe www.dwcsivest.com
United Kingdom MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com

From: Natasha Higgitt [mailto:nhiggitt@sahra.org.za]
Sent: Friday, 11 June 2021 09:24
To: Michelle Guy <MichelleG@sivest.co.za>
Cc: Michelle Nevette <MichelleN@sivest.co.za>; Phillip Hine <phine@sahra.org.za>
Subject: RE: 16499: BESS BAs SAHRA Comment
Importance: Low

Hi there,

Please could you upload the final EMPr to the case as well.

Kind regards,

From: Natasha Higgitt
Sent: 11 June 2021 09:23
To: 'Michelle Guy' <MichelleG@sivest.co.za>
Cc: Michelle Nevette <MichelleN@sivest.co.za>; Phillip Hine <PHine@sahra.org.za>
Subject: RE: 16499: BESS BAs SAHRA Comment
Importance: Low

Good morning,

Thank you for the clarification. Once the letter has been uploaded, please inform me and I will attend to the case.

Kind regards,

From: Michelle Guy <MichelleG@sivest.co.za>
Sent: 11 June 2021 09:21
To: Natasha Higgitt <nhiggitt@sahra.org.za>
Cc: Michelle Nevette <MichelleN@sivest.co.za>; Phillip Hine <phine@sahra.org.za>
Subject: RE: 16499: BESS BAs SAHRA Comment

Hi Natasha

Thanks for the confirmation.

I am reading these sections from the EMPr that was submitted to the Department and the one that was approved. I have checked the EMPr that was uploaded to the SAHRIS website and it's the exact same content, the margins were changed and the report was re-dated when the upload was done to the DFFE.

I will compile a formal letter as discussed below and upload it to the SAHRIS website for your final comment.

Thank you.

Kind regards,

Michelle Guy (*Pr.Sci.Nat*)
Environmental Scientist
SiVEST Environmental Division

D +31 581 1579 | **T** +27 31 581 1500 | **E** michelleg@sivest.co.za | www.sivest.com



Engineering Consulting | Project Management | Environmental Consulting | Town & Regional Planning | Management Systems Consulting

LEVEL 2 BBBEE CONTRIBUTOR IN SOUTH AFRICA

South Africa Durban | East London | Johannesburg | Pietermaritzburg | Pretoria | Richards Bay www.sivest.co.za
Mauritius Daniel Wong Chung Co. Ltd / SIVEST Mauritius: Curepipe www.dwcsivest.com
United Kingdom MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com

From: Natasha Higgitt [<mailto:nhiggitt@sahra.org.za>]
Sent: Thursday, 10 June 2021 16:35
To: Michelle Guy <MichelleG@sivest.co.za>
Cc: Michelle Nevette <MichelleN@sivest.co.za>; Phillip Hine <phine@sahra.org.za>
Subject: RE: 16499: BESS BAs SAHRA Comment
Importance: Low

Good afternoon,

Just to confirm that you are reading this information from the Final EMPr, as these sections in draft EMPr (on the SAHRIS application) are located on different page numbers.

I can confirm that the section referred to on page 105 of the Final EMPr or page 113 of the draft EMPr, covers SAHRAs requirements regarding the need for the results of the walkdown to be submitted to SAHRA.

Please can you provide a letter detailing the response from your office as discussed in these emails, and upload this to the SAHRIS application. I will then issue a formal comment noting that SAHRA is satisfied that our concerns have been addressed and no appeal procedures will be followed.

Kind regards,

From: Michelle Guy <MichelleG@sivest.co.za>
Sent: 10 June 2021 15:36
To: Natasha Higgitt <nhiggitt@sahra.org.za>
Cc: Michelle Nevette <MichelleN@sivest.co.za>; Phillip Hine <phine@sahra.org.za>
Subject: RE: 16499: BESS BAs SAHRA Comment

Dear Natasha

Thanks for the response. I have gone back and reviewed the EMP in more detail as I wasn't involved in the project initially.

In terms of the EMP, it already makes allowance for the walk down in terms of heritage resources, states that the Heritage plan must be updated after the walk down which then has to be submitted to SAHRA for approval.

I note the following excerpts in terms of the walk through assessment/chance find protocol as well as notification to SAHRA.

Page 18

The fieldwork conducted for the evaluation of the possible impact of the new BESS as part of the Platsjambok West PV Energy Facility has revealed 7 heritage resources. The current study has confirmed this finding and with the implementation of a chance finds procedure as part of the EMP will mitigate possible impacts on unidentified heritage resources. An assessment of the final footprint of the BESS must be conducted with the final walkdown of the PV infrastructure layout during the implementation of the EMP. In the event that heritage resources are discovered during site clearance, construction activities must stop in the vicinity, and a qualified archaeologist must be appointed to evaluate and make recommendations on mitigation measures.

The overall impact of the Platsjambok West BESS, on the heritage resources, is seen as acceptably low after the recommendations have been implemented and therefore, impacts can be mitigated to acceptable levels allowing for the development to be authorised.

Page 105 states that The Heritage Plan will be "updated by a heritage specialist once the detailed design stages of the proposed development are complete and the walk-through study has been undertaken". This plan is required to be submitted to SAHRA for comment.

There is also significant allowance made for chance finds in the EMP, and if heritage resources are identified, the following is required:

Page 105

If a chance find is made the person responsible for the find must immediately stop working and all work that could impact that finding must cease in the immediate vicinity of the find.

- The person who made the find must immediately report the find to his/her direct supervisor which in turn must report the find to his/her manager and the ESO or site manager. The ESO or site manager must report the find to the relevant Heritage Agency (South African Heritage Research Agency, SAHRA).

(Contact details: SAHRA, 111 Harrington Street, Cape Town. PO Box 4637, Cape Town 8000, South Africa. Tel: 021 462 4502. Fax: +27 (0)21 462 4509. Web: www.sahra.org.za). The information to the Heritage Agency must include photographs of the find, from various angles, as well as the GPS co-ordinates.

We are not trying to be difficult in any way, and we want to ensure that due process is followed. Please can you confirm that the above sufficiently covers your requirements?

Thank you.

Kind regards,

Michelle Guy (*Pr.Sci.Nat*)
Environmental Scientist
SiVEST Environmental Division

D +31 581 1579 | **T** +27 31 581 1500 | **E** michelleg@sivest.co.za | www.sivest.com



Engineering Consulting | Project Management | Environmental Consulting | Town & Regional Planning | Management Systems Consulting

LEVEL 2 BBBEE CONTRIBUTOR IN SOUTH AFRICA

South Africa Durban | East London | Johannesburg | Pietermaritzburg | Pretoria | Richards Bay www.sivest.co.za
Mauritius Daniel Wong Chung Co. Ltd / SiVEST Mauritius: Curepipe www.dwcsivest.com
United Kingdom MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com

From: Natasha Higgitt [<mailto:nhiggitt@sahra.org.za>]
Sent: Thursday, 10 June 2021 14:45
To: Michelle Guy <MichelleG@sivest.co.za>
Cc: Michelle Nevette <MichelleN@sivest.co.za>; Phillip Hine <phine@sahra.org.za>
Subject: RE: 16499: BESS BAs SAHRA Comment
Importance: Low

Good afternoon,

Thank you for the response. I take note of the management plan mitigation measure in the EMPr, however, SAHRA still requires that a report detailing the results of the walk-down be submitted to SAHRA for review and comment.

Please provide an undertaking that the EMPr will be updated to include this condition. Please provide any response to the Final Comment and this email in a formal letter that must be uploaded to the SAHRIS case application. You may include the contents of your email below as proof that the management plan condition has already been included in the EMPr.

After the letter has been uploaded, I will issue further comments on the case, noting that no appeal procedures will be followed.

Kind regards,

From: Michelle Guy <MichelleG@sivest.co.za>
Sent: 10 June 2021 12:06
To: Natasha Higgitt <nhiggitt@sahra.org.za>
Cc: Michelle Nevette <MichelleN@sivest.co.za>
Subject: RE: 16499: BESS BAs SAHRA Comment

Hi Natasha

I hope you are well.

Thank you for your comments on the Droogfontein site as well as Platsjambok West site. I apologise for the oversight on SiVESTs part regarding this issue.

I have noted the following comments that you want included in the EA or the EMPr for the Platsjambok West project:

- A report detailing the results of the recommended archaeological walk-down be submitted to SAHRA for review and comment;
- A Heritage Management Plan (HMP) must be developed to ensure the long-term management of in situ heritage resources, including monitoring during construction of the in situ heritage resources.

Please find attached the EMPR. Please note that the following has already been included in the EMP that was submitted and approved for this project:

Page 86 (also included on page 69)

Impact	Description	Mitigation
Heritage	<ul style="list-style-type: none">• Impact on archaeological and historical heritage resources• Unidentified heritage structures, beyond the already surveyed portions of the property	<ul style="list-style-type: none">• Include heritage chance finds procedure in• The Heritage Act requires that all operation residues must cease immediately pending• Should any features of heritage significance activities at the location must stop pending• Any heritage features of significance identified require formal mitigation or where possible• A management plan for the heritage resources approved for implementation during construction• A chance finds protocol must be developed

Please confirm you are satisfied that your concerns and comments have already been included in the EMPr and will therefore be taken into consideration.

Thank you kindly.

From: Natasha Higgitt [<mailto:nhiggitt@sahra.org.za>]

Sent: Wednesday, 09 June 2021 16:22

To: Michelle Guy <MichelleG@sivest.co.za>

Subject: RE: 16499: BESS BAs SAHRA Comment

Importance: High

Good afternoon,

Please note that a Final Comment has been issued on SAHRIS Case ID 16540. Please see the link to the case:

<https://sahris.sahra.org.za/cases/battery-energy-storage-system-platsjambok-west-solar-pv-facility-located-near-kimberly>

Please review and address the comment as soon as possible.

Regards,

From: Natasha Higgitt
Sent: 26 May 2021 11:21
To: Michelle Guy <MichelleG@sivest.co.za>
Subject: RE: 16499: BESS BAs SAHRA Comment
Importance: Low

Good morning,

I have checked SAHRIS, and there are no applications for the original EA application within the system. These may have been submitted to SAHRA before SAHRIS came online.

For the current BA EA process, please create applications on SAHRIS. Please include the original EA granted for the project for recording purposes and the comments that SAHRA provided. The comments we would have provided in 2015 may be in a hardcopy format in our registry and might not be digitised yet.

Kind regards,

From: Michelle Guy <MichelleG@sivest.co.za>
Sent: 26 May 2021 09:44
To: Natasha Higgitt <nhiggitt@sahra.org.za>
Subject: RE: 16499: BESS BAs SAHRA Comment

Hi Natasha

Each project has a separate DFFE reference number.

The projects have already received Environmental Authorisation, that is the notification that you were sent from Hlengiwe.

These current BAs were done for BESS that were added onto already approved renewable energy facilities that were undertaken in about 2015 in which your Department commented on.

Kind regards,

Michelle Guy (*Pr.Sci.Nat*)
Environmental Scientist
SiVEST Environmental Division

D +27 31 581 1579 | **T** +27 31 581 1500 **E** michelleg@sivest.co.za | **W** www.sivest.co.za



Engineering Consulting | Project Management | Environmental Consulting | Town & Regional Planning | Management Systems Consulting

LEVEL 2 BBBEE CONTRIBUTOR IN SOUTH AFRICA

South Africa: Durban | East London | Johannesburg | Pietermaritzburg | Pretoria | Richards Bay
Mauritius: SIVEST Mauritius Ltd: Port Louis | Daniel Wong Chung Co. Ltd: Curepipe
United Kingdom: MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com

From: Natasha Higgitt [<mailto:nhiggitt@sahra.org.za>]
Sent: Wednesday, 26 May 2021 9:23 AM
To: Michelle Guy <MichelleG@sivest.co.za>
Subject: RE: 16499: BESS BAs SAHRA Comment
Importance: Low

Good morning,

If the other projects have unique DFFE reference numbers, please create separate applications for each project. Please upload the documents and change the status of the case to SUBMITTED once the project is undergoing the Public review phase of the project. If this phase has been completed, I would advise that you extend the EA process in terms of 19(1)b (if a BAR process) so that SAHRA has the opportunity to provide comments to be included in the final BAR that gets submitted to DFFE.

Kind regards,

From: Michelle Guy <MichelleG@sivest.co.za>
Sent: 26 May 2021 09:07
To: Natasha Higgitt <nhiggitt@sahra.org.za>
Subject: 16499: BESS BAs SAHRA Comment

Hi Natasha

I hope you are keeping well.

I believe you have been in touch with my colleague, Hlengiwe Ntuli regarding the Mainstream BESS BAs.

I have taken over these projects from another colleague who has since left SiVEST. Based on your discussion with Hlengiwe, it seems that the documents were mistakenly not uploaded on the SAHRA website.

Hlengiwe has since uploaded the Droogfontein information, however there were 6 projects in total in which Battery Energy Storage Systems were added onto renewable facilities.

Please advise if we can do the upload now for the other facilities (Loeriesfontein, Mierdam, Dwarsrug, Platsjambok West and Platsjambok East)?

Thank you.

Kind regards,

Michelle Guy (*Pr.Sci.Nat*)
Environmental Scientist
SiVEST Environmental Division

D +27 31 581 1579 | **T** +27 31 581 1500 **E** michelleg@sivest.co.za | **W** www.sivest.co.za



Engineering Consulting | Project Management | Environmental Consulting | Town & Regional Planning | Management Systems Consulting

LEVEL 2 BBBEE CONTRIBUTOR IN SOUTH AFRICA

South Africa: Durban | East London | Johannesburg | Pietermaritzburg | Pretoria | Richards Bay
Mauritius: SiVEST Mauritius Ltd: Port Louis | Daniel Wong Chung Co. Ltd: Curepipe
United Kingdom: MBM Consulting: London, England | Tunbridge Wells, England www.mbmconsult.com