

WSP Ref: 34903
Your Ref: 9/2/055/0002



25 February 2014

South African Heritage Resources Association

Kalahari Solar Power Project, Kathu 465
Attention: Jenna Lavin
111 Harrington Street
Cape Town
8000

Dear Jenna,

RE: SAHRA COMMENTS FOR THE HERITAGE IMPACT ASSESSMENT REPORT FOR THE KALAHARI SOLAR POWER PROJECT LOCATED ON FARM KATHU 465, NEAR KATHU WITHIN THE NORTHERN CAPE PROVINCE

This letter has been drafted in response to the formal correspondence received from the South African Heritage Resources Association (SAHRA) on 25 February 2014 pertaining to the Heritage Impact Assessment (HIA) review undertaken as part of the Environmental and Social Impact Report (ESIR) compiled by WSP Environmental (Pty) Ltd (WSP) on behalf of Kathu Solar Power Park (Pty) Ltd (Kathu Solar Park) for the proposed Kalahari Solar Power (KSP) Project located on Farm Kathu 465 near Kathu in the Northern Cape Province.

The draft ESIR (including draft Environmental and Social Management Programme (ESMP)) was made available for public and commenting authority review from 13 April to 26 May 2011. A hard copy of the draft ESIR (including ESMP and all appendices) was submitted to Mr Andrew Timothy from SAHRA on 13 April 2011 and an electronic copy of the draft ESIR was made available on WSP's website for review. SAHRA, via Mr Andrew Timothy, was also invited (via email) on 11 April 2011 to attend an ESIR feedback meeting which was held on 19 April 2011.

The submission of the draft ESIR to the SAHRA was prior to the development of the South African Heritage Resources Information System (SAHRIS) and as such, WSP relied on follow-up emails to ensure comments were either directed to WSP or submitted to the competent authority (in this case, the Department of Environmental Affairs (DEA)).

It should be noted that the responsibility of WSP as the Environmental Assessment Practitioner (EAP) is to make relevant information pertaining to the proposed KSP available to authorities such as the SAHRA for review and comment prior to finalisation and submission of the ESIR to the decision making authority.

It is WSP's experience that commenting authorities have previously submitted their comments directly to the competent authority for consideration. Furthermore, WSP submitted five hard copies of the final ESIR to the DEA as per the requirements of the National Environmental Management Act (No. 107 of 1998) (NEMA), with specific reference to the EIA Regulations of 2006. It is understood that the competent authority disseminates these reports to relevant government departments (such as the Department of Water Affairs, SAHRA, etc.) for comment. This process is completely independent of WSP.

Following the receipt of the letter dated 25 February 2014 from the SAHRA, it was identified that a Heritage Scoping Assessment (HAS) was undertaken by Dr Robert de Jong from Cultural Heritage Consulting Services, prior to the HIA review (report compiled on 15 December 2010). The HSR was compiled in accordance with the provisions of Section 38(1) and 28(3) of the National Heritage Resources Act (No. 25 of 1999). WSP will upload the HSR onto the SAHRIS website for consideration by SAHRA. In summary, the Scoping Heritage Report concluded that there are no compelling reasons not to proceed with the proposed KSP on the Farm Kathu 465 and that the proposed development can continue provided that a number of measures (four measures) be adopted as heritage management mechanisms, as detailed on page 6 and 32 in the report.

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According to the HIA review undertaken by Dr Robert De Jong from Cultural Heritage Consulting Services, it was concluded that the proposed KSP project on Farm Kathu 465 will have no significant heritage-related impacts (both construction and operation) in terms of physical, visual and environmental impacts (noise, dust, pollution). The report also concluded that the transmission link between the KSP site and the Eskom grid may have negative impacts on heritage impacts as the foundations of the towers and associated structures could expose deposits of archaeological artefacts, however, it was noted that it was the responsibility of Eskom to ensure an additional HIA is undertaken.

Due to the following facts, WSP finalised the ESIR and submitted the report to the DEA for consideration in line with the NEMA during June 2011:

- Findings recorded in the HSR that there were no compelling reasons not to proceed with the proposed KSP on the Farm Kathu 465
- No significant heritage-related impacts are anticipated with the proposed KSP project, according to Dr De Jong's HIA review
- A Heritage Conservation Management Plan (CMP) was compiled by Dr De Jong to minimise potential unforeseen impacts associated with the project
- No comments were received from the SAHRA following lodgement of the draft ESIR with the SAHRA for review and comment

Following a meeting with Norton Rose Fullbright (Norton Rose) on 12 February 2014, it was identified that Kathu Solar Park is to obtain an acceptance/ approval letter from the SAHRA in order to finalise all necessary documentation required for the bid allocation as part of the Renewable Energy Independent Power Producers Procurement Programme at the end of March 2014. WSP is thus requesting assistance from the SAHRA in this regard.

WSP is in communication with Dr De Jong in order to obtain an electronic copy of the HIA completed by Dr J van Schalkwyk in 2010 as referenced in the CMP as soon as possible. WSP will ensure that this report is uploaded onto the SAHRIS website, following which notification will be sent to yourself.

WSP appreciates the effort of the SAHRA with regards to the proposed KSP project. Should you have any issues or queries, please do not hesitate to contact the undersigned.

Kind regards,

A handwritten signature in black ink, appearing to read 'Brent Holme', written in a cursive style.

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