

For Attention:

Natasha Higgitt



**South African Heritage Resources Agency
Department of Arts and Culture
111 Harrington Street
Cape Town
8001**

Tel: 021 202 8660

Email: nhiggitt@sahra.org.za

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RESPONSE TO

INTERIM COMMENT

**In terms of Section 38(3), 38(8) of the National Heritage Resources Act (Act 25 of 1999)
(CASE ID: 21035)**

Firstly, we wish to acknowledge and thank the Department for providing comments on the Draft BAR for the project entitled:

“the upgrading & development of an access road from the N10/‘Burgerville’ District Road (2448) turn-off into the farm Riet Fountain No. 39C and to the Switching station and main transmission substation on Sun Central Cluster 1 (300 MW) Solar PV facility between De Aar & Hanover, Emthanjeni Local Municipality, Pixley Ka Seme District Municipality, Northern Cape Province, South Africa”.

The **“Interim Comment”** dated 05th May 2023 and received via email on the same day has reference:

1. SAHRA requests that a field-assessment of the proposed activities be undertaken as part of the EA Application process. The HIA must confirm the location and extent of the sites identified in 2022 by the representatives of Ecoleges and ground truth any areas associated with the proposed amendment activities.

A Heritage specialist will ground truth the access road alignment. The location and extent of the sites identified in 2022 by the representatives of Ecoleges will, where possible, be confirmed as GPS coordinates were not taken for all three sites. All three sites were located outside the proposed alignment of the road servitude and will therefore not be directly impacted by the project. Any significant findings resulting from the field assessment and corresponding mitigations (management actions) will be added to the overarching Cultural Heritage Management Plan for Sun Central Cluster 1 and associated infrastructure.

2. The applicant is advised to follow the process in terms of section 19(1)b of NEMA in order to extend the EA process to address these comments.

It is not necessary to postpone submission of the final Basic Assessment Report (inclusive of specialist reports and EMPr) to within 140 days of receipt of the application as known heritage sites identified during previous assessments (2017, 2021 & 2022) of the same general area have been mitigated for in the draft EMPr, the same EMPr includes a 'Chance Find' protocol in the case of new finds, and the abovementioned ground-truthing exercise can be carried out in parallel to the BA process, that is prior to the commencement of construction. Any findings from the field assessment of the access road will be added to and mitigated for in the overarching Cultural Heritage Management Plan for Sun Central Cluster 1 and associated infrastructure. We have ensured that the Cultural Heritage Management Plan forms part of the environmental management documentation to be considered during the construction of the access road by updating the draft EMPr to include the following condition:

"The latest revision of the Cultural Heritage Management Plan "... for the Development of a 300 MW Solar Photovoltaic (PV) Facility and Associated Infrastructure on Several Portions of Farms in the Hanover District..." prepared by A. J. Pelsers of APelsers Archaeological Consulting (APAC) and dated September 2022 and any subsequent revisions, must be implemented to the extent that it applies to 'chance finds' and known archaeological and/or historical sites potentially impacted by the alignment and construction activities of the access road and borehole pipelines."



Yours sincerely,

Shaun MacGregor (MSc., Pr.Sci.Nat., Reg. EAP)

Member and Senior Consultant



Environmental Consultants

Cell: +27 (0)64 885 2240

Email: shaun@ecoleges.co.za