



an agency of the
Department of Arts and Culture

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CaseID: 13051

Date: Monday August 01, 2022

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Final Comment

In terms of Section 38(4) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Twenty Nine Capital (Pty) Ltd

On 05 September 2016, the five proposed photovoltaic (PV) facilities and associated electrical infrastructure were granted Environmental Authorisation (EA) by the National Department of Environmental Affairs (DEA). This process supports an Application for Substantive Amendment to the EA for Edison PV and shared electricity infrastructure (DEA Reference Number: 14/12/16/3/3/2/851) in terms of Section 31 Part 2 Amendment of the National Environmental Management Act: Environmental Authorisation Regulations. The existing and valid EA encompasses the 100 megawatt Edison Solar PV Facility and the shared electricity infrastructure. The Applicant (29 Solar Pty. Ltd) wishes to undertake the following amendments to the EA: 1) Split the EA for “Edison PV and shared electricity infrastructure” into two separate EAs: i) EA 1 – Edison PV: for the listed activities and components associated with the Edison PV facility; and ii) EA 2 – 29 Solar Electricity Infrastructure: for the listed activities and components associated with the shared electricity infrastructure (EA2); 2) Amend the electricity infrastructure voltage specification (which applies to the high voltage (HV) transmission line, connecting the proposed MTS and the existing Eskom HV electricity infrastructure), from 275 kilovolt (kV) to 400 kV, and the specification of the MTS from 132/275 kV to 132/400 kV, to be included in EA2, if granted; and 3) Amend the layout of the electricity infrastructure by moving the locations of the collector substations and Main Transmission Station (MTS), as well as the associated routing of the 132 kV transmission line connecting the collector substations and MTS and short 400 kV transmission line connecting the MTS to the existing Eskom 400 kV transmission line (EA2), if granted. Despite the proposed amendments, the Edison PV facility and 29 Solar Electricity Infrastructure would still be developed within the approved site (development envelope). Furthermore, the above changes do not influence the findings of the EIA, nor does it constitute a change in the scope of the development, the potential impacts and their mitigation measures, or the listed activities authorised in the original and valid EA. As confirmed by the specialists who undertook the studies for the original, approved EIA, implementation of the proposed amendments to the EA for Edison PV and the 29 Solar Electricity Infrastructure do not influence the findings of the original impact assessment, and will not result in additional or unacceptable environmental impacts. As such, it is the opinion of the Environmental Assessment Practitioner (EAP) that the proposed changes and issue amended EAs for 1) Edison PV, and 2) the 29 Solar Electricity Infrastructure be approved.



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This amended final comment acknowledges the name change of the solar project from Edison Solar PV to Indlovu Solar PV (Pty) Ltd and an increase of electrical capacity from 100MW to 125MW.

The applicant proposes substantive amendments regarding the layout of the electricity infrastructure and project specification of the electricity infrastructure capacity. The changes are proposed to not influence the findings of the authorised EIAr, nor do they constitute a change in the potential impacts and their mitigation measures, the listed activities authorised in the original and valid EA, or the rights and responsibilities of the Applicant in terms of the EA and EMPr. The original application and SAHRA final comment can be found under SAHRIS CaseID 8660.

The application is part of a larger project of five PV facilities and associated infrastructure over nine farms near Dealesville in the Free State Province. It entails the construction of the Edison photovoltaic facility and associated infrastructure on the remainder of the farm Cornelia 1550 and the remainder of the farm Modderpan 750. As requested in an interim comment from 27 November 2015, a Heritage Impact Assessment (HIA) and desktop Palaeontological Impact Assessment (PIA) were submitted to the application CaseID 8660 and a final comment had been issued by SAHRA approving of the development. The content of the HIA and PIA are summarised below:

ORTON, J. 2016. HERITAGE IMPACT ASSESSMENT: SCOPING AND ENVIRONMENTAL IMPACT ASSESSMENT FOR THE PROPOSED DEVELOPMENT OF THE EDISON PV 100 MW PHOTOVOLTAIC FACILITY NEAR DEALESVILLE, FREE STATE.

The author found various Stone Age artifact scatters, historical ruins, graves and graveyards in the study area (see Table 1; locations are plotted in Figure 7). The following resources are of medium to high significance and should be avoided or recorded/mitigated: dolerite stone kraal (GPS No. 870), stone/brick/cement features (GPS No. 871), graveyard (GPS No. 883), farmhouse ruin (GPS No. 886).

Recommendations:

- Any significant archaeological sites that cannot be avoided with a buffer of at least 20 m should be mitigated well in advance of the start of construction. It should be noted that it is permissible for transmission lines to span archaeological sites, but any associated service roads and the facility access roads must avoid them;



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- All construction and operation activities must take place within the authorised construction footprint so as to minimise damage to nearby heritage resources;
- All graves should be avoided with a buffer of at least 5 m; and
- Earthy-coloured paint should be used on the built elements of the project so as to reduce the visual contrast in the landscape.

ROSSOUW, L. 2016. PALAEOLOGICAL DESKTOP ASSESSMENT OF 5 NEW SOLAR PHOTOVOLTAIC FACILITIES TO BE ESTABLISHED OVER NINE FARMS NEAR DEALESVILLE, FREE STATE PROVINCE.

The proposed area is underlain by the Tierberg Formation (Ecca Group), which is of moderate palaeontological sensitivity. Trace fossil assemblages, fragmentary fish remains and plant remains may occur. Unfossiliferous dolerite dykes and sills are common. Overlying sediments are highly significant along major water courses and spring and pan dune deposits.

Recommendations:

A palaeontologist should be appointed to appraise the final development footprint and, if necessary, suggest any further measures that may be required to mitigate potential impacts.

An amendment letter was submitted discussing the impact of the amendments on heritage resources identified in the HIA:

ORTON, J. 2018. 29 SOLAR DEALESVILLE - AMENDMENT OF ENVIRONMENTAL AUTHORISATION FOR EDISON PV.

Two new areas of increased risk were identified by the specialist:

1) The new position of the 400/132 kV Main Transmission Substation in the south of the study area is about 200 m to the south of the graves recorded at waypoint 926 (Figure 1 in the HIA). The proposed farm fence that



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will enclose the substation area will run about 60 m from the graves. While this change will not specifically result in any new impacts, it does slightly increase the chances of accidental impacts occurring. Therefore, the pre-mitigation impact significance/risk should be increased to moderate for both the construction and decommissioning phases. The post-mitigation impact significance/risk would remain at very low.

2) The new position of the 400/132 kV Main Transmission Substation is about 600 m to the northeast of the archaeological site at waypoint 922 (Figure 1 in the HIA). While this is of no concern, the position of the proposed fence around the substation area is right next to the no-go area around the archaeological site (Figure 3 in the HIA).

Additional recommendations:

The set of graves at waypoint 926 must be fenced with a permanent stock fence set at least 5 m away from all sides of the graves. A pedestrian gate must be provided to facilitate access.

The ECO should be aware of no-go area that is the archaeological site under point (2) and must ensure that activity in this area is minimised.

All existing recommendations remain valid and should be included in the amended EA for the electrical infrastructure.

Final comment

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts the HIA and PIA and has no objection against the proposed development. The recommendations in the HIA and PIA (as outlined above) and the following conditions must be adhered to:

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1. During line maintenance and cutting of grass below the lines, care must be taken around identified heritage sites. Additionally, when cables for the transmission lines are strung during the construction phase, the cables should not be allowed to drag through sites located between towers.
2. Should avoidance of the identified resources not be possible, they must be recorded and a mitigation permit must be applied for at SAHRA by a professional archaeologist or palaeontologist.
3. Should any objects of archaeological or palaeontological remains be found during construction activities, work must immediately stop in that area and the Environmental Control Officer (ECO) must be informed.
4. The ECO must inform the South African Heritage Recourse Agency (SAHRA) and contact an archaeologist and/or palaeontologist, depending on the nature of the find, to assess the importance and rescue them if necessary (with the relevant SAHRA permit). No work may be resumed in this area without the permission from the ECO and SAHRA.
5. If the newly discovered heritage resource is considered significant a Phase 2 assessment may be required. A permit from the responsible heritage authority will be needed.
6. The above recommendations must be incorporated into the Environmental Management Programme (EMPr) for implementation. The decision on the amendment must be uploaded to the application.

Should you have any further queries, please contact the designated official using the case number quoted above in the case header.

Yours faithfully

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Ragna Redelstorff, PhD
Heritage Officer
South African Heritage Resources Agency

Phillip Hine
Manager: Archaeology, Palaeontology and Meteorites Unit
South African Heritage Resources Agency

ADMIN:

Direct URL to case: <https://sahris.sahra.org.za/node/513616>
(DEA, Ref:)

Terms & Conditions:

1. This approval does not exonerate the applicant from obtaining local authority approval or any other necessary approval for proposed work.
2. If any heritage resources, including graves or human remains, are encountered they must be reported to SAHRA immediately.
3. SAHRA reserves the right to request additional information as required.