Our Ref:



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Enquiries: Natasha Higgitt Tel: 021 462 4502 Email: nhiggitt@sahra.org.za CaseID: 10094 Date: Thursday October 20, 2016 Page No: 1

Final Comment

In terms of Section 38(8) of the National Heritage Resources Act (Act 25 of 1999)

Attention: Perception Heritage Planning PO Box 9995 GEORGE 653

PROPOSED DEVELOPMENT OF THE AMDA CHARLIE PV (SOLAR ENERGY FACILITY) ON PORTION 1 OF N'ROUGAS ZUID NO 121, STRAUSSHEIM AS WELL AS OVERHEAD POWER LINE GRID CONNECTION TO THE ESKOM NIEUWEHOOP MTS SUB-STATION ACROSS PORTION 3 OF GEMSBOK BULT NO120, KENHARDT DISTRICT, NORTHERN CAPE PROVINCE

Cape Environmental Assessment Practitioners (Pty) Ltd (were appointed by MADA Charlie (Pty) Ltd to conduct an Environmental Impact Assessment Process for the proposed AMDA Charlie Solar PV Energy Facility and overhead Power Line Grid Connection. The proposed project is located on portion 1 of N'Rougas Zuid No 121, Straussheim and portion 3 of Gemsbok Bult No 120 near Kenhardt, Northern Cape Province. A Final Scoping Report was completed in term of the National Environmental Management Act, 1998 (NEMA) and the Environmental Impact Assessment (EIA) Regulations 2014. The proposed development will comprise a development footprint of approximately 250 ha with a solar PV field, sub-station, collector sub-station, buildings, roads and an access road, and permanent and construction laydown areas. The proposed 132kV powerline will connect to the Eskom Nieuwehoop MTS Substation with a confirmed capacity of 245MW and will be 5.5 km in length. Additional infrastructure will include possible pipelines and powerlines, and a sewage system.

Perception Planning was appointed to conduct the Heritage Impact Assessment (HIA) as part of the EIA process. Dr Peter Nilssen and Dr John Almond were appointed to provide the Archaeological Impact Assessment Report (AIA) and Palaeontological Impact Assessment (PIA) for the project respectively.

Nilssen, P. 2016. Phase 1a Archaeological Impact Assessment: Proposed development of the AMDA Charlie PV (Solar Energy Facility) on Portion 1 of N'Rougas Zuid No 121, Straussheim, and overhead Powerline Grid Connection to the Eskom Nieuwehoop MTS Sub-station across Portion 3 of Gemsbok Bult No 120, Kenhardt Registration Division, Northern Cape Province.

The Archaeological Impact Assessment makes the following recommendations:

• Although a very ephemeral background scatter of temporally mixed Stone Age stone artefacts was



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identified in the study areas, these are considered to be of low significance and require no further investigation or mitigation.

- Two Stone Age Quartz quarry sites were identified for preservation within the proposed development footprint. The two identified sites are identified in the AIA with following waypoint markers: 122A, 130 and 131. A fence should be constructed around these sites (under the supervision of an archaeologist) to prevent any damage to the sites during construction.
- The further identified quarry sites are considered to be adequately recorded by the AIA report, and no further mitigation is recommended. Furthermore, it is recommended that due to their low significance, these sites may be destroyed without the requirement of a permit from SAHRA.
- The LSA & MSA pan sites identified at waypoints 125 and 127 are considered to be of medium significance and should preserved *in-situ*. A temporary fence should be constructed around these sites (under the supervision of an archaeologist) to prevent any damage to the sites during construction.
- The presence of sub-surface archaeological resources, although considered unlikely, cannot be ruled out, and it is therefore recommended that the appointed Environmental Control Officer for the proposed development should be adequately trained so as to be able to identify any archaeological resources, should they be uncovered during construction.
- Should any archaeological resources be uncovered during the construction phase of the proposed development, all activities in the vicinity must cease, and SAHRA must be immediately notified. Such resources must be handled in accordance with the NHRA (1999).
- Should any burials or graves be uncovered during development, all activities in the vicinity must cease, and SAHRA must be immediately notified. A professional archaeologist will be required to make an assessment and conduct mitigation as required.

Almond, J. 2016. Recommended Exemption from Further Palaeontological Studies: Proposed AMDA Charlie Solar PV Development on Portion 1 of N'Rougas Zuid No 121, Kenhardt Registration Division, Northern Cape.

This report was discussed in the Interim Comment issued on the 10 October 2016 and will not be discussed further. Comments regarding this report in the Interim Comment are still valid and apply to the proposed development.

De Kock, S. 2016. Integrated Heritage Impact Assessment in terms of Section 38(8) of the National Heritage Resources Act, 1999 (Act 25 of 1999). Proposed development of the AMDA PV (Solar Eneergy Facility) on Portion 1 of N'Rougas Zuid No 121, Straussheim as well as overhead power line grid connection to the Eskom Nieuwewhoop MTS sub-station across portion 3 of Gemsbok Bult No 120, Kenhardt District, Northern Cape Province.

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In addition to the aforementioned recommendations, the Integrated Heritage Impact Assessment also recommends that all of the detailed mitigation measures as outlined in the Visual Impact Assessment should be adhered to.

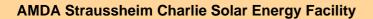
Visual Resource Management Africa CC. 2016. Visual Impact Assessment: Specialist Report for Environmental Impact Assessment for the proposed AMDA Straussheim Alpha PV, Northern Cape Province.

- Without mitigation the visual significance for all phases of the development is considered to be Medium. With the prescribed mitigation measures the visual significance is reduced to Low. The remote nature of the area results in a very low sensitivity with regard to the visual receptors;
- Laydown areas should be placed away from drainage lines, to prevent unsightly erosion;
- Buildings and structures should be painted a grey-brown colour.

Final Comment

SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit accepts and promotes the recommendations of the AIA, Palaeontological Letter of Exemption and Integrated HIA. No further Palaeontological Specialist studies are required for the proposed development. The recommendations provided in the Heritage Reports and the following conditions must be included in the EMP for project:

- Archaeological Stone Age Quarry sites 122A, 130 and 131 must be avoided with a 30 m buffer. The sites must be clearly defined and fenced off (under the supervision of an accredited archaeologist) and maintained during all phases of development;
- MSA & LSA Pan sites at waypoint 125 and 127 must be avoided with a 30 m buffer. The sites must be clearly defined and fenced off (under the supervision of an accredited archaeologist) and maintained during all phases of development;
- A Conservation Management Plan (CMP) must be developed for the *in-situ* preservation of the identified significant heritage resources located within the development footprint;
- The remainder of the identified quarry sites are considered to be adequately recorded by the attached AIA and should the proposed development receive a positive Environmental Authorization, the remaining quarry sites will not require a permit for their destruction;
- Laydown areas should be placed away from drainage lines, to prevent unsightly erosion;
- Buildings and structures should be painted a grey-brown colour;
- The final EIA and all appendices must be submitted to SAHRA and uploaded to the case file;
- If any evidence of archaeological sites or remains (e.g. remnants of stone-made structures, indigenous ceramics, bones, stone artefacts, ostrich eggshell fragments, charcoal and ash concentrations), fossils



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or other categories of heritage resources are found during the proposed development, SAHRA APM Unit (Natasha Higgitt/John Gribble 021 462 5402) must be alerted. If unmarked human burials are uncovered, the SAHRA Burial Grounds and Graves (BGG) Unit (Itumeleng Masiteng/Mimi Seetelo 012 320 8490), must be alerted immediately. A professional archaeologist or palaeontologist, depending on the nature of the finds, must be contracted as soon as possible to inspect the findings. If the newly discovered heritage resources prove to be of archaeological or palaeontological significance, a Phase 2 rescue operation may be required;

• Should the proposed development be granted an Environmental Authorisation, SAHRA must be informed and the decision letter must be uploaded to the case file.

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

Yours faithfully

Natasha Higgitt Heritage Officer South African Heritage Resources Agency

John Gribble Manager: Maritime and Underwater Cultural Heritage Unit / Acting Manager: Archaeology, Palaeontology and Meteorites Unit South African Heritage Resources Agency

ADMIN:

AMDA Straussheim Charlie Solar Energy Facility

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Direct URL to case: http://www.sahra.org.za/node/369352 (DEA, Ref: 14/12/16/3/3/2943)

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.