



an agency of the  
Department of Arts and Culture

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CaseID: 13047

Date: Thursday November 08, 2018  
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## Interim Comment

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

Attention: IL Energy Development (Pty) Ltd

**Project Name: Allepad PV Three Applicant: ILEnergy Development (Pty) Ltd Proposed Activity: The development of a 100MW Photovoltaic (PV) facility and associated infrastructure, including the following infrastructure: » Arrays of PV panels with a generation capacity of up to 100MW. » Mounting structures to support the PV panels. » Combiner boxes, on-site inverters (to convert the power from Direct Current (DC) to Alternating Current (AC)), and power transformers. » A 132kV on-site substation up to 1ha in extent to facilitate the connection between the solar energy facility and the Eskom electricity grid. » A new 132kV power line approximately 5km in length, between the on-site substation and Eskom grid connection point. » Cabling between the project's components (to be laid underground where practical). » Meteorological measurement station. » Energy storage area of up to 2ha in extent. » Access road and internal access road network. » On-site buildings and structures, including a control building and office, ablutions and guard house. » Perimeter security fencing, access gates and lighting. » Temporary construction equipment camp up to 1ha in extent, including temporary site offices, parking and chemical ablution facilities. » Temporary laydown area up to 1ha in extent, for the storage of materials during the construction. Project Location: The site is located approximately 11km north-west of Upington, in the Northern Cape, with the following properties identified for the development of the four PV facilities, and the supporting grid connection infrastructure: PV facilities: » Remaining Extent of Erf 5315 Upington Grid connection: » Remaining Extent of Erf 5315 Upington » Erf 01 Upington**

Savannah Environmental (Pty) Ltd has been appointed by ILEnergy Development (Pty) Ltd to conduct an Environmental Authorisation (EA) Application process for the proposed Allepad PV Three facility, near Upington, Northern Cape Province. A draft Scoping Report (DSR) has been completed in terms of the National Environmental Management Act, 1998 (NEMA) and the 2017 NEMA Environmental Impact Assessment (EIA) Regulations. The proposed development will include the construction of an array of PV panels with a generation capacity of up to 100 MW, mounting structures for the PV panels, electrical infrastructure, on-site substation, powerline, cabling, energy storage area, access roads, control building, offices, ablutions, guard house, temporary construction camp and laydown area.

CTS Heritage had been appointed to provide heritage input into the EA Application process as per section

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38(8) of the National Heritage Resources Act, Act 25 of 1999 (NHRA).

*Lavin, J. 2018. Heritage Screener. Proposed development of Allepad PV Three, a solar PV Facility and associated infrastructure on a site near Upington, in the Northern Cape Province.*

The Heritage Screener showed that the heritage resources in the proposed development area have not been sufficiently recorded, and that an archaeological field assessment be conducted to inform a full Heritage Impact Assessment (HIA). The Heritage Screener indicated that the development area is of low palaeontological sensitivity and therefore no further assessment of palaeontological resources is required.

#### **Interim Comment**

The SAHRA Archaeology, Palaeontology and Meteorites (APM) Unit notes the submitted Heritage Screener and awaits the pending HIA. SAHRA does not accept the recommendation of the Heritage Screener that no further assessment of palaeontological resources is required. The SAHRIS PalaeoSensitivity map shows that the development area is located within an area of moderate palaeontological sensitivity and therefore a desktop assessment of palaeontological resources is required. The assessment must comply with the 2012 SAHRA Minimum Standards: Palaeontological Components of Heritage Impact Assessments and must be compiled by a qualified palaeontologist. The 2012 Minimum Standards makes reference to a Letter of Recommendation for Exemption that may be submitted, should the palaeontologist deem is necessary.

SAHRA awaits the pending HIA inclusive of an archaeological and palaeontological component, that takes into consideration the results of the Visual Impact Assessment and any heritage related comments during the public review periods, along with the Final Scoping report and the draft EIA with associated appendices when available for public review before further comments are issued.

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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Natasha Higgitt  
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South African Heritage Resources Agency

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South African Heritage Resources Agency

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**ADMIN:**  
Direct URL to case: <http://www.sahra.org.za/node/513606>